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Attorneys for Defendants Fairfax Financial Holdings Limited, Odyssey Re Holdings Corp., V. Prem Watsa, Trevor J. Ambridge, Greg Taylor, M. Jane Williamson, Robbert Hartog, Anthony F. Griffiths, Bradley P. Martin, and Brandon Sweitzer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLUMBERS, PIPEFITTERS & MES LOCAL
UNION NO. 392 PENSION FUND, On Behalf of
Itself And All Others Similarly Situated,

Plaintiff,

v.

FAIRFAX FINANCIAL HOLDINGS LIMITED,
et al.,

Defendants.

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No. 11 CV 5097 (JFK)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Declaration of Brian H. Polovoy dated December 16, 2011, and the exhibits thereto, defendants Fairfax Financial Holdings Limited, Odyssey Re Holdings Corp., V. Prem Watsa, Trevor J. Ambridge, Greg Taylor, M. Jane Williamson, Robbert Hartog, Anthony F. Griffiths, Bradley P. Martin, and Brandon Sweitzer, by and through undersigned counsel, will move this Court, before the Honorable John F. Keenan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, for an order dismissing the above-captioned complaint with prejudice

pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b)(3)(A), and Rules 9(b), 12(b)(1), and 12(b)(6) of the Federal Rules of Civil Procedure; and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
December 16, 2011

SHEARMAN & STERLING LLP

By: /s/ Brian H. Polovoy
Brian H. Polovoy
Jeffrey J. Resetarits

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ERZULIE D. COQUILLON, being duly sworn, deposes and says:

On December 16, 2011, I caused a true and correct copy of the Notice of Motion to Dismiss, Memorandum of Law in Support of the Fairfax Defendants' Motion to Dismiss the Class Action Complaint, and the Declaration of Brian H. Polovoy in Support of Fairfax Defendants' Motion to Dismiss to be served by U.S. mail upon the following:

Mario Alba, Jr.
Samuel Howard Rudman
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58 South Service Road, Suite 200
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485 Lexington Avenue, 29th Floor
New York, NY 10017


Erzulie D. Coquillon

Sworn to before me this
20th day of December 2011


Notary Public

BRYAN JANKAY
Notary Public, State of New York
No. 01JA6172051
Qualified in New York County
Commission Expires Aug. 6, 2015